

**Martco Limited Partnership
Martco Limited Partnership - Chopin Mill
Chopin, Natchitoches Parish, Louisiana
Agency Interest Number: 32484**

Sulfur Dioxide (SO₂) – An oxide of sulfur.

Sulfuric Acid (H₂SO₄) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Martco Limited Partnership	AI #:	32484	TEMPO Activity No:	PER20080001
Facility Name:	Chopin Mill	Remarks Submitted by:	Cindy Thompson		
Permit Writer:	Christopher Smith	Permit Writer Email address:	Christopher.smith@la.gov		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Requirement 120”, or “Section II Air Permits Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information **must be submitted**. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating Requirements not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – **DO NOT COMPLETE THIS SECTION.** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.

- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

- **DO NOT USE THIS FORM TO SUBMIT COMMENTS DURING THE OFFICIAL PUBLIC COMMENT PERIOD.**

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Table 1 – EQT009, EQT010, & RLP032	Applicable requirements for EQT009 & EQT010 should be identical to RLP032 since this represents the same equipment.	EQT009, 9-94 – Thermal Oil Heating Unit A, and EQT010, 9A-94 – Thermal Oil Heating Unit B, contains requirements applicable to the sources like performance tests and fuel rate records under NSPS Subpart Dc. RLP032, 9-94/9A-94 – Thermal Oil Heating Unit A & B, only contains those requirements applicable to the release of emissions from the thermal oil heating unit.
Table 1 – UNF001	40 CFR 63 Subpart DDDD should be “3” (Does Not Apply). This is a minor source of HAPs. This should be added to Table 2.	Table 1 and 2 are correct as written in the permit. According to the ‘Key to Matrix’, a ‘2’ should be listed in Table 1 when the source is currently exempt due to meeting a specific criteria. The Chopin Mill may become subject to 40 CFR 63 Subpart DDDD if any of the HAPs are emitted above 10 tons per year.

<p>Inventories – EQT0027</p>	<p>Discharge Area (square feet) is listed as 96. According to the EIQ, 96 is the Diameter (feet). This change should be made.</p>	<p>The change has been made as requested.</p>
<p>Inventories – EQTs 0013, 0015, 0016, 0025, 0028, 0030 & FUG0001</p>	<p>Zeros listed for Velocity, Flow Rate, Diameter, and Height should be deleted.</p>	<p>The change has been made as requested.</p>
<p>Emission Rates for TAP/HAP & Other Pollutants – RLP0032</p>	<p>1,2,3,4,6,7,8,9 – Octachlorodibenzodioxin should be removed and replaced with Chlorinated Dibenzo-P-Dioxins as this is the pollutant that appears in the facility total UNF0001. Chlorinated Dibenzo-P-Dioxins is also the pollutant that was included in the application for EQT0009 & EQT0010, and RLP0032 combines the emissions for these. The emission rates are the same.</p>	<p>The change has been made as requested.</p>
<p>Emission Rates for TAP/HAP & Other Pollutants – RLP0032</p>	<p>The Tons/Year emission rate for Formaldehyde is incorrect. It should be changed from 0.032 to 0.036. The correct rate is 0.036 tons/year because RLP0032 combines emissions of 0.018 tons/year from EQT0009 & 0.018 tons/year from EQT0010. The facility total (UNF001) includes this rate. This change would make the current total in UNF0001 correct.</p>	<p>The change has been made as requested.</p>
<p>Emission Rates for TAP/HAP & Other Pollutants – UNF0001</p>	<p>For consistency, the Tons/Year emission rates for Chlorinated Dibenzo-P-Dioxins and Chlorinated dibenzofurans should be changed to <0.001 since the only emissions from these pollutants are from RLP032, and in RLP0032, the emissions are listed as <0.001 Tons/Year.</p>	<p>The change has not been made. The Louisiana Guidance for Air Permitting Actions dated February 26, 2008 states that annual and hourly emissions of chlorinated dibenzofurans and chlorinated dibenzo-p-dioxins, which have a Minimum Emission Rate (MER) of 0.0001 lb/year, must be reported to eight (8) decimal places.</p>
<p>Emission Rates for TAP/HAP & Other Pollutants – UNF0001</p>	<p>The Tons/Year emission rate for Copper (and compounds) is incorrect. It should be changed from 0.002 to 0.003. The total currently does not include emissions of 0.001 tons/year from EQT0029.</p>	<p>The change has been made as requested.</p>
<p>Specific Requirement 37 – EQT0004</p>	<p>Monitoring the operating hours for the press will be representative of monitoring the operating hours for EQT0004. Therefore, operating hours for the press will be monitored to fulfill this requirement. Please clarify in the permit that monitoring the operating hours for the press will be used to indirectly monitor the operating hours for EQT0004.</p>	<p>Language has been to the permit stating that the monitoring of the operating hours for the press is used to indirectly monitor the operating hours of EQT0004, S-94 – Sander No. 1 Cyclone. The operating hour requirements have been removed from EQT0004.</p>

<p>Specific Requirements 101, 103, 104, & 105 for EQT0012; Specific Requirements 107, 110, 111, & 112 for EQT0013; Specific Requirements 114, 117, 118 & 119 for EQT0014; Specific Requirements 121, 124, 125, & 126 for EQT0015; Specific Requirements 128, 131, 132, & 133 for EQT0016; Specific Requirements 135, 138, 139, & 140 for EQT0025</p>	<p>Martco cannot continuously monitor the operating time for these sources. Please remove these specific requirements. The total PM₁₀ emissions are permitted for only 0.133 TPY; therefore, continuous monitoring of these sources is not economically feasible.</p>	<p>The requirements to continuously monitor the operating time from EQT0012, 1-02 - Filler Storage Silo 44132-1, EQT0013, 2-02 - Corn Flour Storage Silo 44133-1, EQT0014, 3-02 - Wheat Flour Storage Silo 44134-1, EQT0015, 4-02 - Soda Ash Dump Station 44135, EQT0016, 5-02 - Filter Receiver 44139, and EQT0025, 8-02 - Power Bin Vent 44145, have been removed as requested.</p>
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